REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 1-30 stand rejected under 35 USC 103 as allegedly being unpatentable over Balakrishnan in view of Scott et al., Comerford et al. and Schmid et al. This contention is respectfully traversed.

The way in which Balakrishnan handles the different grammars is entirely different than, and inconsistent with, the way the grammars are handled by the presently claimed system.

Referring to Claim 1 as representative, the claims recite that when the system determines a change in the information (where the "information" represents which of a plurality of applications is being used), the method operates to load a first grammar for a first application, and to load a second different grammar for a second application and unloading the first grammar. The cited prior art does not teach unloading the first grammar. Moreover, Balakrishnan could not be operatively modified to unload the language models. Unloading grammars goes against the teaching of Balakrishnan. In fact, Balakrishnan could not operate as described if it were modified in this way.

Balakrishnan teaches that the first and second vocabularies 44 and 46 and the first and second language models 48 and 50 are stored in the memory. See for example column 3 lines 31-35. In operation, when the user speaks a command, the "applets" 33 and 37 form a score for the recognition based on each of the language models. If one of those language models were unloaded, Balakrishnan could never form such multiple scores. See, generally, column 4 lines 29-37. The arbitrator determines that the application which provides the highest score will receive the input speech and act on it. See column 4 lines 38-40.

If Balakrishnan were modified to unload a grammar, then Balakrishnan could not use the arbitrator at all, and could not operate in the way described above. Putting this another way, if Balakrishnan were modified to do the things now defined by Claim 1, than Balakrishnan could not operate according to its own specified teaching.

The hypothetical combination of Balakrishnan in view of Scott et al., Comerford et al. and Schmid et al., therefore, could not teach unloading the first grammar and loading a second grammar when detecting a change. This would contradict Balakrishnan.

Moreover, the subject matter now defined by Claim 1 produces an advantage. Any physical system has a finite amount of resources. Especially when speech detection is being carried out, the amount of total resources that are applied to a speech problem can greatly affect the recognition capability of the speech. The subject matter of Claim 1 determines an application, unloads one grammar and reloads the other grammar, and hence can allow more effective resources to be used with the more important grammar.

Claim 1 specifically requires detecting a change in "said information" (where the said information is information about which of the plurality of applications is currently being used) and detecting a change in the information and unloading the first grammar and loading a second different wrapper. As described above, Balakrishnan does not teach this subject matter, and could not be modified to teach the subject matter without contradicting its teaching.

Even if, however, the secondary references were combined with Balakrishnan for exactly the reasons suggested in the official action, they still would not provide a hypothetical combination that rendered obvious the claimed subject matter.

Scott et al. does teach a system in which the speech engine is separate from the actual application which is used. Scott et al. teaches that the speech server is accessible from a Web browser over the Internet and hence is separate. This does nothing to teach the grammar loading and unloading discussed above, and defined by Claim 1.

Comerford et al. is provided to show separate user interface files on separate platforms in a speech assistant. Even assuming that this shows exactly what is suggested by the official action, it still does not render obvious or suggest the loading and unloading of speech parts. The cited section, column 5 lines 40-47 simply suggests that many different kinds of interfaces may exist, but does nothing to suggest the multiple loading and unloading of devices.

Schmid et al. is provided to supposedly teach loading and unloading the grammars according to the application requirements. However, this could not be operatively combined with Balakrishnan for reasons discussed above. Even if combined with Balakrishnan, it teaches nothing about the unloading and loading. Column 5 lines 65 through column 6 line 3 described that multiple different applications in different grammars can be used with the single engine. Column 6 line 27 states that

additional grammars can be loaded, and that other grammars can be loaded or unloaded. See, column 6 lines 31-32. The general statement that the grammars can be loaded and unloaded, however, does nothing to render obvious the specifically claimed subject matter of detecting a change in the application which is being used, loading one grammar and unloading the other. In fact, Schmid et al. teaches a very specific set of grammar rules, see Schmid et al.'s discussion beginning column 6 line 49. During speech recognition, the engine traverses the state diagram. See column 6 line 65-66. The state diagram is further described throughout column 7, and at the top of column 8.

Column 8 beginning at line 10 describes how figure 3 can be used to load the grammar from an application. This actually loads the grammar from the application, not in response to detecting which application is being currently used, as claimed. Line 26 describes how the CFG engine is used to load grammar. Once the grammar is loaded, new words associated with the grammar are passed to it, see column 8 lines 45-46. The remainder of column 8, and the top of column 9 describes using this grammar. Column 9 beginning at line 37 describes the grammars can be removed in the reverse process. Therefore, while multiple grammars can be used and loaded by applications,

see column 9 lines 53-54, there is no teaching or suggestion of this being done in response to which of a plurality of applications is currently being used, and the specific language of Claim 1 which loads a first grammar and unloads a first grammar.

This demonstrates the unobviousness of the subject matter of Claim 1. Moreover, as described above, a person having ordinary skill in the art could not operatively combine this teaching with Balakrishnan, without contradicting the express teaching of Balakrishnan.

Claim 1 should hence be allowable for these reasons along with the claims that depend therefrom.

Claim 12 includes analogous limitations to those discussed above, and hence should be allowable for similar reasons.

Claim 22 also includes analogous limitations and should also be allowable.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed.

Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed. No fee is believed to be due, however please apply any applicable charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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